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COMMERCIAL TELEPHONES, INC.
8510 NW 56 STREET
MIAMI, FL 33166

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December 9, 2004

FEDERAL COMMUNICATIONS COMMISSION
Chairman Michael Powell
The Portals
445-12th Street, SW, Room 8-B201
Washington, DC 20554

RE: WC Docket No. 03-225, Access to unbundled Network Elements

Dear Chairman Powell,

I would appreciate your support in order to revise the rules for the Unbundled Network Element (UNE). Businesses like ours need your continued support for competitive alternatives to meet our service needs.

Payphones are a necessity even though there is a large rise in cellular phone usage. Many citizens who can not afford wireless services do need and use payphones. In an emergency situation like 9/11/01 cellular phones circuits were busy or not operating due to the large volume of usage.

In my business my largest operational cost is local line service. To offer quality service at a low cost, we rely on competitive local service rates. The only competitive alternative for us to date is UNE-P. We have been forced to disconnect various payphones due to the operating cost exceeding the payphones revenue. The public will be forced to lose the availability and convenience of these locations for the service they count on today.

Please take the necessary steps needed to ensure the FCC's revised UNE rules preserve competitive local rates for payphones. Your Consideration is appreciated.

Sincerely,


John Stewart
Vice-President

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